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Subject: Copper and Cadmium TRV Review
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Here are my comments on the selected copper and chromium TRVs.

Copper:

Copper TRVs are identified in the memo as a TRV for invertebrates only. However, the Round 3 tissue shows the highest fish concentration as 7.16 mg/kg (in sculpin). The value use in the Round 2 Report for screening was 3.1 mg/kg from Dyer et al., 2000. This shows that a TRV will need to be developed for fish based on the Round 3 data.

I have no comments on the development of the invertebrate TRVs other than to say that these values (2.02 and 2.83 mg/kg) are slightly lower than what was used in the Round 2 Report, and I am assuming the EPA SLERA (3.1 mg/kg as reported above). However, for perspective all Round 3 values are above both TRVs, with a range of 4.57 to 9.54 mg/kg (clam) and 14.3 to 20.3 mg/kg (crayfish).

Chromium:

Chromium TRV development is identified for fish only. The chromium TRV used in the Round 2 Report for invertebrates was 2.7 mg/kg based on a estimate from AWQC and a BCF. The Round 3 data for clam and crayfish supports this conclusion, as does the mussel analysis from Sept. 2007, which also was not included in the Round 2 Report screening.

I have no comments on the development of the fish TRV other than to say that this value (1.05 mg/kg) is less than what was used in the Round 2 Report, and I am assuming the EPA SLERA (2.7 mg/kg as reported above).

-Jennifer